

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

ORIGINAL

JUDGE KAPLAN

- - - - - x

UNITED STATES OF AMERICA :

- v. - :

INDICTMENT

IRA RICHARDS, :

a/k/a "Ira Richerds," :

a/k/a "Ira Richerd," :

a/k/a "Shyne," :

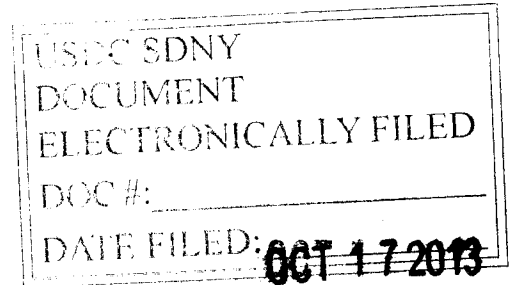
a/k/a "Shyne Jones," :

a/k/a "Mr. 95," :

Defendant. :

- - - - - x

**13 CRIM 818**



COUNT ONE

(Conspiracy to Commit Sex Trafficking)

The Grand Jury charges:

1. From at least in or about July 2012, up to and including in or about August 2012, in the Southern District of New York and elsewhere, IRA RICHARDS, a/k/a "Ira Richerds," a/k/a "Ira Richerd," a/k/a "Shyne," a/k/a "Shyne Jones," a/k/a "Mr. 95," the defendant,<sup>1</sup> and others known and unknown, in and affecting interstate commerce, did knowingly combine, conspire, confederate and agree to recruit, entice, harbor, transport, provide, obtain, and maintain by any means a person, and to benefit, financially and by receiving anything of value, from participation in a venture which has engaged in any such act, knowing and in reckless disregard of the fact that means of force, threats of force, fraud and coercion, and a

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1 For ease of reference, the defendant's aliases are not repeated throughout this Indictment.

combination of such means, would be used to cause the person to engage in a commercial sex act, to wit, RICHARDS and others known and unknown caused a woman ("Victim-1") to engage in commercial sex acts in the Bronx by means of force, threats of force, fraud and coercion, and a combination of such means.

OVERT ACTS

2. In furtherance of the conspiracy and to effect the illegal object thereof, the following overt acts, among others, were committed in the Southern District of New York and elsewhere:

a. In or about 2012, IRA RICHARDS, the defendant, recruited Victim-1 to work for him as a prostitute.

b. In or about 2012, RICHARDS caused an advertisement to be posted on the Bronx escorts section of the classifieds website "Backpage.com," under a Backpage customer identified as "ira richards," offering Victim-1 for commercial sex.

c. In or about 2012, RICHARDS caused an advertisement to be posted on the Bronx escorts section of the classifieds website "Backpage.com," under a Backpage customer identified as "ira richerd," offering Victim-1 for commercial sex.

d. In or about 2012, IRA RICHARDS, the defendant, beat Victim-1 as punishment for attempting to escape from him, and subsequently, forced Victim-1 to offer herself for commercial sex despite her injuries.

(Title 18, United States Code, Section 1594(c).)

COUNT TWO

(Sex Trafficking)

The Grand Jury further charges:

3. From at least in or about July 2012, up to and including in or about August 2012, in the Southern District of New York and elsewhere, IRA RICHARDS, the defendant, in and affecting interstate commerce, knowingly did recruit, entice, harbor, transport, provide, obtain, and maintain, by any means a person, and did benefit, financially and by receiving anything of value, from participation in a venture which has engaged in any such act, knowing and in reckless disregard of the fact that means of force, threats of force, fraud and coercion, and a combination of such means, would be used to cause the person to engage in a commercial sex act, to wit, RICHARDS caused Victim-1 to engage in commercial sex acts by means of force, threats of force, fraud and coercion, and a combination of such means.

(Title 18, United States Code, Sections 1591(a) and (b)(1).)

COUNT THREE


(Use of Interstate Commerce to Promote Unlawful Activity)

The Grand Jury further charges:

4. From at least in or about July 2012, up to and including in or about October 2013, in the Southern District of New York and elsewhere, IRA RICHARDS, the defendant, did use and cause to be used facilities in interstate and foreign commerce, to wit internet and cellular telephone services, with the intent to promote,

manage, establish, carry on and facilitate the promotion, management, establishment and carrying on of an unlawful activity, to wit, a business enterprise involving prostitution offenses in violation of applicable state law, and thereafter performed and attempted to perform an act to promote, manage, establish and carry on, and to facilitate the promotion, management, establishment and carrying on of such unlawful activity.

(Title 18, United States Code, Section 1952(a)(3).)

A handwritten signature, possibly reading "RF", enclosed within a hand-drawn oval.

FOREPERSON

A handwritten signature in cursive script, appearing to read "Preet Bharara".

PREET BHARARA  
United States Attorney

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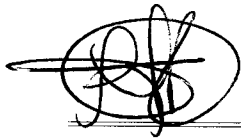
13 Cr.

(18 U.S.C. §§ 1591, 1594 & 1952)

PREET BHARARA  
United States Attorney.

A TRUE BILL

Foreperson.



10/17/13 Filed Indictment